

EXHIBIT Q

KEKER & VAN NEST LLP

633 Battery Street
San Francisco, CA 94111-1809
415 391 5400
kvn.com

Cody S. Harris
(415) 676-2294
charris@kvn.com

May 4, 2012

VIA EMAIL

Dean M. Harvey
LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339

Re: *In Re: High-Tech Employee Antitrust Litigation*, No. C 11-02509 LHK

Dear Dean:

I hope you're doing well. As you know, at the Case Management Conference ("CMC") held on April 18, 2012, the Court ordered a May 9, 2012 deadline for each defendant to begin a rolling production of responsive ESI. Because Plaintiffs never responded to Lucasfilm's list of proposed custodians—and because negotiations between Plaintiffs and the joint defendants over specific search terms have thus far failed to result in a final list of agreed-upon keywords—Lucasfilm intends to move forward using the search terms attached hereto as Exhibit A.

As you will see, the list includes search terms derived from three sources: (1) the parties' discussions regarding joint search terms; (2) the Lucasfilm-specific search terms Plaintiffs previously proposed; and (3) search terms Lucasfilm used during the DOJ investigation, to the extent they are not captured in either of the other two categories.

As for custodians, Lucasfilm will search the 16 custodians listed in my letter to you dated March 27, 2012. We will search these custodians' ESI according to the date ranges the parties agreed to during the April 18 CMC. The "key" DOJ custodians, whose files will be searched from January 1, 2004 through December 31, 2011, are Jan van der Voort and Sharon Coker.

Please feel free to call me with any questions, or to discuss this matter further.

Very truly yours,



Cody S. Harris

CSH:em

ATTACHMENT A:
Lucasfilm Ltd.'s Search Terms

Terms Based on Joint-Defendants' Search Terms	
1	"anti-trust"
2	"civil investigative demand"
3	"cold call*"
4	"cold-call*"
5	"counter-offer*"
6	"do not approach"
7	"do not call"
8	"do not hire"
9	"do-not-hire"
10	"free market"
11	"hands - off"
12	"hands -off"
13	"hands- off"
14	"hands-off"
15	"never counter"
16	"no counter*"
17	"no-hire"
18	"non - solicit*"
19	"non -solicit*"
20	"non- solicit*"
21	"non-solicit*"
22	"six month" w/2 rule
23	(agree* or hand* or tacit or understand* or verbal or unwritten or informal or unspoken or table or deal or permission) w/5 (secret or "not known" or "do not tell" or hush or "don't tell" or HR or "human resources" or "can't tell" or "cannot tell" or quiet or hidden or hide or hid or cover or disguise or veil or suppress or "hold back")
24	(no or "not" or non or never or "don't" or "do not" or "can't" or cannot or "can not" or stop or end or "won't" or "will not") pre/3 (hire* or recruit* or employ* or solicit* or interview or "talk to" or offer or counter or call)
25	(no or non or "not" or never or don't or "do not" or "can't" or cannot or "can not") w/2 solicit*
26	bullet and (silver or magic*)
27	bully
28	CID
29	coldcall*
30	colligan
31	croner

32	doj
33	dunlap
34	evil
35	facebook w/10 (compet* or pay or salar* or interview* or poach or calling or recruit* or raise* or employe* or hir* or compensation or call*)
36	gent* w/2 agree*
37	gent* w/2 understand*
38	gloves off
39	gloves on
40	hands off
41	handsoff
42	honor* w/5 (agree* or understand* or process or arrangement)
43	illegal
44	informal w/2 agree*
45	informal w/2 polic*
46	informal w/2 understand*
47	injunction
48	justice
49	laika
50	limit* w/5 compet*
51	moratorium
52	no recruit
53	notif* w/5 HR
54	off limit*
55	passive w/5 (candidate* or person or employ* or people or talent)
56	permission w/5 (offer* or bid* or recrui*t or hir* or call*)
57	pillag*
58	poach*
59	poach* or ("no-poach*" or "anti-poach*")
60	prohib* w/5 (recruit* or hir* or call or contact)
61	radford
62	raid*
63	subpoena
64	tacit w/2 agree*
65	tacit w/2 understand*
66	threat*
67	unlawful
68	unspoken w/2 agree*
69	unspoken w/2 polic*
70	unspoken w/2 understand*

71	unwritten w/2 agree*
72	unwritten w/2 polic*
73	unwritten w/2 understand*
74	verbal w/2 agree*
75	verbal w/2 understand*
76	violate
77	won't compete
78	wrong
79	zuck*
Terms Based on Lucasfilm-Specific Search Terms	
1	("adobe.com" or "apple.com" or "google.com" or "intel.com" or "intuit.com" or "pixar.com" or "Disney.com" or "facebook.com" or "palm.com") w/25 (solicit* or poach or recruit* or target* or approach* or raid* or (gentlem* w/3 agreement) or ((mak* or made or exten*) w/10 offer*) or (Counter* and not counterpart*) or (hire or hiring) or "non-compete" or "do not contact" or "cold call")
2	(agree or hand* or tacit or understand* or solicit or recruit or pay or compensation or bonus or offer or applica* or candidat* or target or wage or benefit* or morale or fair or hire or compet* or employ* or verbal or unwritten or informal or unspoken or table or deal or permission or green or ok or target or prospect* or "cold call" or passive) w/5 (Adobe or Apple or Google or Intel or Pixar)
3	(Ed or Edward) w/2 Martin
4	(Jon or John or Jonathan) w/2 Rosenberg
5	(Michael or Mike) w/2 McNeal
6	Arnnon
7	Baja
8	Bechtel
9	"best and final offer"
10	Bock
11	Campbell
12	Catmull
13	Chizen
14	DC Studios
15	Elop
16	Evangelista
17	Felch
18	Fennell
19	final w/2 best
20	Gaither
21	Geshuri
22	Lambert
23	Laszlo

24	Lintner
25	Narayan
26	Otellini
27	Pandemic
28	Red Storm
29	Schmidt and Google
30	Secret Level
31	Shantanu
32	sjobs
33	Stinson
34	Townsley
35	Vijungco
36	Whiteley
Terms Based on Original DOJ Search Terms	
1	"Alias/Wavefront"
2	"Artificial Mind Movement"
3	"brain drain"
4	"contract employee"
5	"coordinator binder"
6	"courtesy notice"
7	"Day 1"
8	"Day One"
9	"Digital Domain"
10	"do not compete"
11	"do not contact"
12	"do not re-engage"
13	"heads up"
14	"n-Space"
15	"Natural Motion"
16	"no hire"
17	"Pacific Data Images"
18	"R and H"
19	"Sony Imageworks"
20	"Sony Online"
21	"The Secret Lab"
22	"Traveler's Tale"
23	"under contract"
24	A2M
25	Activision w/25 (solicit* or poach or recruit* or target* or approach* or raid* or (gentlem* w/3 agreement) or ((mak* or made or exten*) w/10 offer*) or (Counter* and not

	counterpart*) or (hire or hiring) or "non-compete" or "do not contact" or "cold call")
26	Alias Wavefront
27	Amaze
28	antitrust
29	Avalanche
30	Bioware
31	Blue Sky
32	Blur
33	Bungee
34	Chrome
35	Cinecite
36	competition
37	competitor
38	counteroffer
39	courtesy call
40	DD
41	Disney w/25 (solicit* or poach or recruit* or target* or approach* or raid* or (gentlem* w/3 agreement) or ((mak* or made or exten*) w/10 offer*) or (Counter* and not counterpart*) or (hire or hiring) or "non-compete" or "do not contact" or "cold call")
42	DNA
43	DNC
44	DNH
45	DNR
46	DreamWorks w/25 (solicit* or poach or recruit* or target* or approach* or raid* or (gentlem* w/3 agreement) or ((mak* or made or exten*) w/10 offer*) or (Counter* and not counterpart*) or (hire or hiring) or "non-compete" or "do not contact" or "cold call")
47	EA w/25 (solicit* or poach or recruit* or target* or approach* or raid* or (gentlem* w/3 agreement) or ((mak* or made or exten*) w/10 offer*) or (Counter* and not counterpart*) or (hire or hiring) or "non-compete" or "do not contact" or "cold call")
48	Electronic Arts w/25 (solicit* or poach or recruit* or target* or approach* or raid* or (gentlem* w/3 agreement) or ((mak* or made or exten*) w/10 offer*) or (Counter* and not counterpart*) or (hire or hiring) or "non-compete" or "do not contact" or "cold call")
49	Escape
50	Framestore
51	Free Radical
52	Frontier
53	Havoc
54	Havok
55	IM Digital
56	IMD

57	Krome
58	KUJU
59	MANIX
60	Microsoft w/25 (solicit* or poach or recruit* or target* or approach* or raid* or (gentlem* w/3 agreement) or ((mak* or made or exten*) w/10 offer*) or (Counter* and not counterpart*) or (hire or hiring) or "non-compete" or "do not contact" or "cold call")
61	non-compete
62	Obsidian
63	Orphanage
64	outplacement
65	PDI
66	Petroglyph
67	Pinnacle
68	Pixar
69	Pixelux
70	Puffin
71	R H
72	Radium
73	Rebellion
74	recruiting bible
75	Red Flag
76	Rhythm AND Hues
77	Rhythm Hues
78	SGI
79	solicit
80	Sony w/25 (solicit* or poach or recruit* or target* or approach* or raid* or (gentlem* w/3 agreement) or ((mak* or made or exten*) w/10 offer*) or (Counter* and not counterpart*) or (hire or hiring) or "non-compete" or "do not contact" or "cold call")
81	Tata
82	The Mill
83	Tippett
84	TT Games
85	ViFX
86	Western
87	Weta
88	Whiskeytree
89	Whiskytree